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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.
Hon. Fernando M. Olguin

Dated this: , 2025

**[PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION TO
COMPEL DISCOVERY RESPONSES, FOR SANCTIONS UNDER FRCP 37, AND FOR
A PROTECTIVE ORDER**

Upon consideration of Plaintiff Marc Wolstenholme’s Motion to Compel
Discovery, Request for Sanctions pursuant to Rule 37 of the Federal Rules of Civil Procedure,
and Motion for Protective Order; and having considered all supporting documentation and the
record in this matter:

IT IS HEREBY ORDERED THAT:

Defendant Riot Games, Inc. shall produce full and complete responses to
Plaintiff’s outstanding discovery requests, including:

Initial disclosures under Rule 26(a)(1);

Interrogatory responses identifying relevant personnel and submission reviewers;

Riot Forge portal server and metadata logs;

Any documents referencing Plaintiff’s work or submission materials.

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2 Defendant shall permit a neutral, court-appointed forensic expert to inspect and
3 preserve relevant metadata and logs concerning the Riot Forge submission system, subject to a
4 mutually agreed protocol.
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7 Sanctions are imposed on Defendant under Rule 37(b) for failure to engage in
8 good faith discovery conduct. Defendant is ordered to pay Plaintiff's reasonable costs associated
9 with filing this motion.
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12 A Protective Order is entered under Rule 26(c) to bar further harassment and
13 obstruction during discovery, including abusive meet and confer behavior. All future meet and
14 confer interactions shall be conducted in writing or under court supervision.
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17 The Court refers this matter to the appropriate authority for preliminary review of
18 whether litigation misconduct by Defendant or its counsel, including alleged misrepresentation
19 of evidence, may warrant further ethical or criminal inquiry.
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22 Plaintiff is permitted to raise supplemental concerns and seek additional relief
23 should new evidence of obstruction, fraud, or discovery violations emerge.
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1 IT IS SO ORDERED.
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3 DATED: _____, 2025
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6 Hon. Fernando M. Olguin

7 United States District Judge
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